

## REMARKS

This application has been carefully reviewed in light of the Office Action dated June 23, 2009. Claims 11 to 15 and 21 are pending in the application. Claim 11 is the sole independent claim. Reconsideration and further examination are respectfully requested.

Claims 11 to 15 and 21 were rejected under 35 U.S.C. § 103(a) over U.S. Publication No. 2002/0108118 (Cohen) and U.S. Patent No. 6,356,813 (Sommer). Reconsideration and withdrawal of this rejection are respectfully requested.

Independent Claim 11 generally concerns selective access to a removable storage medium. A storage apparatus includes a first interface unit that has a first port for connection to a first external apparatus, and a second interface unit that has a second port for connection to a second external apparatus. The storage apparatus further includes a third interface unit for connection to a removable storage medium. A control unit sets the first port in an enable state or a disabled state, and sets the second port in the enabled state or the disabled state.

According to aspects of Claim 11, the first port is returned to the enabled state from the disabled state if the control unit determines that the second external apparatus is disconnected from the second port when the first port is in the disabled state. Conversely, the second port is returned to the enabled state from the disabled state if the control unit determines that the first external apparatus is disconnected from the first port when the second port is in the disabled state.

By virtue of this arrangement, it is ordinarily possible to shift access to the storage medium back to a connected apparatus when another apparatus is disconnected from its port.

Referring specifically to claim language, independent Claim 11 is directed to a storage apparatus. The apparatus includes a first interface unit for connection to a first external apparatus, the first interface unit having a first port to which the first external apparatus is connectable and disconnectable and through which the first interface unit connects to the first external apparatus. The apparatus also includes a second interface unit for connection to a second external apparatus, the second interface unit having a second port to which the second external apparatus is connectable and disconnectable and through which the second interface unit connects to the second external apparatus. The apparatus further includes a third interface unit for connection to a removable storage medium. In addition, the apparatus includes a control unit that controls the first port and the second port and sets the first port or the second port in a disabled state. If the first interface unit detects that the first external apparatus is connected to the first port, the control unit determines whether the first external apparatus is capable of accessing the removable storage medium connected to the third interface unit. If the second interface unit detects that the second external apparatus is connected to the second port, the control unit determines whether the second external apparatus is capable of accessing the removable storage medium connected to the third interface unit. The control unit does not set the second port in the disabled state until the control unit determines that the first external apparatus connected to the first port is capable of accessing the removable storage medium connected to the third interface unit. The control unit does not set the first port in the

disabled state until the control unit determines that the second external apparatus connected to the second port is capable of accessing the removable storage medium connected to the third interface unit. If the control unit determines that the second external apparatus is disconnected from the second port when the first port is in the disabled state, the control unit returns the first port from the disable state to the enable state. If the control unit determines that the first external apparatus is disconnected from the first port when the second port is in the disabled state, the control unit returns the second port from the disable state to the enable state.

The applied art is not seen to disclose or suggest the features of Claim 11, and in particular is not seen to disclose or suggest at least the features of (i) returning a first port to an enabled state from a disabled state if there is a determination that a second external apparatus is disconnected from a second port when the first port is in the disabled state, and (ii) returning the second port to the enabled state from the disabled state if there is a determination that the first external apparatus is disconnected from the first port when the second port is in the disabled state.

Page 5 of the Office Action concedes that Cohen does not disclose determining whether the first external apparatus is capable of accessing the removable storage medium if the first interface unit detects that the first external apparatus is connected to the first port, or determining whether the second external apparatus is capable of accessing the removable storage medium if the second interface unit detects that the second external apparatus is connected to the second port. Page 5 of the Office Action further concedes that Cohen does not disclose declining to set the second port in the disabled state until the control unit determines that the first external apparatus connected to

the first port is capable of accessing the removable storage medium, or declining to set the first port in the disabled state until the control unit determines that the second external apparatus connected to the second port is capable of accessing the removable storage medium.

Applicant agrees, and submits that as a consequence of these failings of Cohen, Cohen also fails to disclose or suggest (i) returning a first port to an enabled state from a disabled state if there is a determination that a second external apparatus is disconnected from a second port when the first port is in the disabled state, and (ii) returning the second port to the enabled state from the disabled state if there is a determination that the first external apparatus is disconnected from the first port when the second port is in the disabled state.

Sommer is not seen to remedy the deficiencies of Cohen. As understood by Applicant, Sommer is directed to a control system of a vehicle. The control system includes a memory having two ports which receive respective accesses from two computer systems. If the memory simultaneously receives accesses from the two computer systems through the respective ports, the memory transmits a halt signal to one of the two computer system through an interface which is not connected to the port. See Sommer, Abstract and Column 4, lines 14 to 23.

However, Sommer is not seen to disclose or suggest re-enabling one port if another port is disconnected, much less (i) returning a first port to an enabled state from a disabled state if there is a determination that a second external apparatus is disconnected from a second port when the first port is in the disabled state, and (ii) returning the second port to the enabled state from the disabled state if there is a determination that the first

external apparatus is disconnected from the first port when the second port is in the disabled state.

Therefore, independent Claim 11 is believed to be in condition for allowance, and such action is respectfully requested.

The other claims in the application are each dependent from independent Claim 11 and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the claims, however, the individual consideration of each on its own merits is respectfully requested.

No other matters being raised, the entire application is believed to be in condition for allowance, and such action is courteously solicited.

Applicant's undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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